

**UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 2:22-cv-293-JRG
vs.	)	
	)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;	)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,	)	
INC.; SAMSUNG SEMICONDUCTOR	)	
INC.,	)	
	)	
Defendants.	)	

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**DECLARATION OF JASON SHEASBY IN SUPPORT OF  
PLAINTIFF NETLIST, INC.'S SUPPLEMENTAL BRIEF IN SUPPORT  
OF ITS OPPOSITION TO SAMSUNG'S MOTION FOR SUMMARY  
JUDGMENT OF NO WILLFULNESS [DKT. 437]**

**I, Jason G. Sheasby, declare as follows:**

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Supplemental Brief in Support of its Opposition to Samsung’s Motion for Summary Judgment of no Willfulness (Dkt. 437). I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a copy of the redacted verdict form filed in *Netlist Inc. v. Samsung Elecs. Co., Ltd.*, No. 8:20-cv-993, Dkt. 556.

3. Attached as **Exhibit 2** is a copy of Samsung’s Motion for Judgment as a Matter of Law, or in the Alternative, for a New Trial, filed in *Netlist Inc. v. Samsung Elecs. Co., Ltd.*, No. 8:20-cv-993, Dkt. 596.

4. Attached as **Exhibit 3** is a copy of the jury instructions filed in *Netlist Inc. v. Samsung Elecs. Co., Ltd.*, No. 8:20-cv-993, Dkt. 553.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 20, 2024.

By /s/ Jason G. Sheasby  
Jason G. Sheasby